

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

2024 JAN -4 PM 12:04

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANTHONY J. WILLIAMS,
a/k/a "A.J."

Defendant.

CASE NO. 24-cr-00002

JUDGE *Vanderpool*

INDICTMENT

18 U.S.C. § 371
18 U.S.C. § 2114(a)
18 U.S.C. § 924(c)(1)(A)(i)-(ii)
18 U.S.C. § 2(a)
Pinkerton v. United States

THE GRAND JURY CHARGES:

COUNT 1

(Conspiracy to Commit an Offense Against the United States)

1. Beginning on or about November 8, 2022, and continuing up to and including January 25, 2023, the exact dates being unknown, in the Southern District of Ohio, the defendant, ANTHONY J. WILLIAMS, a/k/a "A.J." knowingly conspired and agreed with Co-Conspirator #1, Co-Conspirator #2, Co-Conspirator #3, Co-Conspirator #4, and other individuals both known and unknown to the Grand Jury, to commit certain offenses against the United States, including postal robberies, mail theft, and bank fraud.

OBJECTS OF THE CONSPIRACY

2. It was an object of this conspiracy to rob employees of the United States Postal Service ("USPS") of property belonging to the United States—namely, USPS-issued postal keys, in violation of 18 U.S.C. § 2114(a) ["Postal Robbery"].

3. It was a further object of this conspiracy to steal and take mail matter and articles and things contained therein from the United States Mail, in violation of 18 U.S.C. § 1708 [“Mail Theft”].

4. It was a further object of the conspiracy to knowingly execute and attempt to execute a scheme to defraud a bank and to obtain money owned by and under the custody and control of a bank by means of false and fraudulent pretenses, representations, and promises, in violation of 18 U.S.C. § 1344 [“Bank Fraud”].

MANNER AND MEANS OF THE CONSPIRACY

The manner and means of conduct used by this conspiracy included, but were not limited to, the following:

5. It was part of the conspiracy that **WILLIAMS**, together with other individuals both known and unknown to the Grand Jury, would carry out armed robberies of USPS employees. **WILLIAMS** and his co-conspirators targeted these employees for their postal keys, which could unlock USPS “blue boxes” and other authorized receptacles for the deposit and delivery of mail matter.

6. It was further part of the conspiracy that **WILLIAMS**, together with other individuals both known and unknown to the Grand Jury, would then use those stolen postal keys to access USPS “blue boxes” and other authorized receptacles for the deposit and delivery of mail matter for the purpose of stealing mail matter and articles and things contained therein. This process was referred to as “fishing.” **WILLIAMS** and his co-conspirators focused on obtaining personal and business checks, money orders, and other financial instruments that individuals had deposited with the United States Mail for delivery.

7. It was further part of the conspiracy that Co-Conspirator #1, together with other individuals both known and unknown to the Grand Jury, then executed and attempted to execute a scheme to defraud banks and to obtain money owned by and under the custody and control of those banks by means of false and fraudulent pretenses, representations, and promises. Co-Conspirator #1 and other co-conspirators executed and attempted to execute this scheme by first altering the stolen checks, money orders, and other financial instruments to reflect new payees' names and new payment amounts. This process was referred to as "cooking." Co-Conspirator #1 and other co-conspirators then recruited third parties to deposit the altered checks, money orders, and other financial instruments into their own bank accounts, instead of the original, true payees' accounts. These third parties were referred to as "heads." Once the money had been so deposited, Co-Conspirator #1 and other co-conspirators directed the "heads" to withdraw the illicit funds from their bank accounts. Co-Conspirator #1 and other co-conspirators then paid the "heads" a fee from the proceeds of these illicit funds while keeping the remainder of the illicit funds for themselves.

8. It was further part of the conspiracy that Co-Conspirator #1 used the proceeds of the bank fraud to pay other individuals, including WILLIAMS, to commit further robberies of USPS employees.

OVERT ACTS

In furtherance of this conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the Southern District of Ohio by one or more of the co-conspirators:

9. Beginning on or about November 8, 2022, Co-Conspirator #1 arranged for Co-Conspirator #2 to provide his Glock 19 handgun to the defendant, **ANTHONY J. WILLIAMS, a/k/a “A.J.”** for the purpose of committing an armed robbery of a USPS employee.

10. On November 9, 2022, Co-Conspirator #3 drove the defendant, **ANTHONY J. WILLIAMS, a/k/a “A.J.”** to Co-Conspirator #2’s house so that **WILLIAMS** could pick up Co-Conspirator #2’s Glock 19 handgun to use during the planned armed robbery of a USPS employee.

11. On November 9, 2022, Co-Conspirator #3 drove the defendant, **ANTHONY J. WILLIAMS, a/k/a “A.J.”** to the vicinity of 720 Michigan Avenue, Columbus, Ohio, where **WILLIAMS** robbed a USPS employee (“Victim #1”) of his postal keys, including his USPS-issued “Arrow Key,” at gunpoint.

12. On November 9, 2022, the defendant, **ANTHONY J. WILLIAMS, a/k/a “A.J.”** turned over the stolen “Arrow Key” to Co-Conspirator #1 in exchange for roughly \$2,000.00 – \$500.00 of which Co-Conspirator #1 sent to **WILLIAMS** via CashApp shortly after the robbery.

13. Beginning on or about December 22, 2022, Co-Conspirator #1 and the defendant, **ANTHONY J. WILLIAMS, a/k/a “A.J.”** worked together to plan another armed robbery of a USPS employee. As part of that plan, Co-Conspirator #1 provided **WILLIAMS** with a firearm, shoes, a mask, and gloves to use during the robbery.

14. On December 24, 2022, the defendant, **ANTHONY J. WILLIAMS**, a/k/a “A.J.” and Co-Conspirator #4 robbed a USPS employee (“Victim #2”) of his postal keys, including his USPS-issued “Arrow Key,” in the vicinity of 6708 Kodiak Drive, Canal Winchester, Ohio. During this robbery, **WILLIAMS** and Co-Conspirator #4 assaulted Victim #2 by punching him in the chin and threatening to kill him if he did not turn over his postal keys.

15. Between on or about November 9, 2022, and January 25, 2023, the exact dates being unknown, Co-Conspirator #1 recruited the defendant, **ANTHONY J. WILLIAMS**, a/k/a “A.J.” and other individuals, both known and unknown to the Grand Jury, to go “fishing” with stolen postal keys—i.e., to use their stolen keys to go steal mail from USPS “blue boxes” and other authorized receptacles for the deposit and delivery of mail matter.

All in violation of 18 U.S.C. § 371.

COUNT 2
(Aggravated Robbery of Property of the United States)

16. On or about November 9, 2022, in the Southern District of Ohio, the defendant, **ANTHONY J. WILLIAMS**, a/k/a “A.J.”, did knowingly and intentionally rob Victim #1, a person having lawful charge, control, and custody of mail, money, or other property of the United States of his United States Postal Service “Arrow Key,” and, in effecting such robbery, did jeopardize the life of Victim #1 by the use of a dangerous weapon, that is, a Glock 19 handgun.

In violation of 18 U.S.C. § 2114(a).

COUNT 3
(Use of a Firearm During and in Relation to a Crime of Violence)

17. On or about November 9, 2022, in the Southern District of Ohio, the defendant, **ANTHONY J. WILLIAMS, a/k/a “A.J.”**, did knowingly and intentionally use, carry, and brandish a firearm, that is, a Glock 19 handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, the Robbery of Victim #1 as charged in Count 2 of this Indictment, the allegations of which are incorporated here by reference.

In violation of 18 U.S.C. § 924(c)(1)(A)(i)-(ii).

COUNT 4
(Aggravated Robbery of Property of the United States)

18. On or about December 24, 2022, in the Southern District of Ohio, the defendant, **ANTHONY J. WILLIAMS, a/k/a “A.J.”**, did knowingly and intentionally rob Victim #2, a person having lawful charge, control, and custody of mail, money, or other property of the United States of his United States Postal Service “Arrow Key,” and, in effecting such robbery, did wound Victim #2.

In violation of 18 U.S.C. §§ 2114(a), 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

s/Foreperson
Foreperson

**KENNETH L. PARKER
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